

THE LAW OFFICES OF SEAN M. MAHER, PLLC

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December 3, 2019

**VIA ECF**

Honorable Sterling Johnson, Jr.  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**RE: *United States v. Velentzas et al., (Noelle Velentzas),*  
15 Cr. 213 (SJ)**

Dear Judge Johnson:

On behalf of Ms. Velentzas, I respectfully write to request that the sentencing hearing scheduled for December 18, 2019 be rescheduled for a date between February 24 - March 12, 2020. This request is made for two reasons. First, the initial draft of the Presentence Report (PSR) has not been completed. I have communicated with the Probation Office about this, and it is my understanding that the Probation Office needs six more weeks to complete the PSR. In full disclosure, I needed to reschedule the presentence interview and postpone it until late October because of ongoing serious medical issues of a close member of my family. Second, I am still working on mitigation tasks on behalf of Ms. Velentzas, including collecting necessary records, which I believe will not be completed by the current sentencing submission deadline.

I have relayed this adjournment request to the government and have been informed by AUSA Joshua Hafetz that the government takes no position on my request.

The Court's consideration is greatly appreciated.

Respectfully submitted,

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Sean M. Maher  
*Counsel for Noelle Velentzas*

cc: All counsel (via ECF)